

Appl. No. 09/751,427  
Amdt. dated July 16, 2004  
Reply to Office Action of April 16, 2004

### REMARKS

This Amendment is in response to the Final Office Action mailed April 16, 2004. Applicant has filed a Request for Continued Examination to have the Office withdraw the finality of the Office Action and have this submission entered and considered. In the Office Action, the Examiner rejected claims 1-25 under 35 U.S.C. § 103. Reconsideration in light of the amendments and remarks made herein is respectfully requested.

#### *Rejection Under 35 U.S.C. § 103*

2. The Examiner rejects claims 1-6, 9-17, and 19-25 under 35 U.S.C. § 103(a) as being unpatentable over Arends et al. (US 6,560,712) in view of Hannah (US 5,784,581).

In rejecting claims 1 and 14, now cancelled, the Examiner admitted that Arends does not disclose coupling a peripheral device to the bus as the default master if the computer's CPU is in a second power management state. The Examiner cited Hannah (col. 2, lines 1-24) as inherently disclosing a peripheral device that becomes a default bus master when a CPU is in a second power management state.

Applicant presents new independent claim 26. Claim 26 includes the element of a switchable interface that couples a switchable peripheral device to a bus either as a peripheral device or as a master device as determined by the power management state of the first default master. Applicant respectfully submits that this distinguishes the claimed invention from the disclosure of Hannah. Hannah only shows a device that provides two interfaces (e.g. FIG. 4 privileged port 40 and hub 42) where one of the two interfaces is activated to allow the peripheral device to operate as a slave device and the other of the two interfaces is activated to allow the peripheral device to operate as a master device. The claimed invention uses a single switchable interface which is configured to couple the peripheral device as either a slave or master device without the use of a different interface. Further, the claimed invention couples the switchable peripheral device to the same plurality of slave peripheral devices through the same bus as the master interface. The first default bus master and the switchable peripheral device when coupled as the second default bus master are coupled to exactly the same set of peripheral device. Hannah discloses a peripheral device that may be connected as a master device only to those peripheral that are connected to the peripheral device's downstream interface. For example, in FIG. 3 of Hannah, the VCR 20 is not a master device to peripheral disk drive 16 but the USB Host Controller 10 is a master device to the disk drive.

Applicant presents new independent claim 27. Claim 27 is a method claim that is distinguished from the disclosures of Arends and Hannah for the same reasons as discussed above for apparatus claim 26.

Applicant has amended independent claim 27. Claim 27 is a system claim that, as amended, is distinguished from the disclosures of Arends and Hannah for the same reasons as discussed above for apparatus claim 26.

Claims 9-13 and 20 are cancelled.

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As per claims 2-8, 15-17, 19, and 22-25, applicant relies on the patentability of the claims from which these claims depend to traverse the rejection without prejudice to any further basis for patentability of these claims based on the additional limitations recited.

Applicant respectfully requests that the Examiner withdraw the rejection of claims 1-6, 9-17, and 19-25 under 35 U.S.C. § 103(a) as being unpatentable over Arends in view of Hannah.

3. The Examiner rejects claims 7 and 18 under 35 U.S.C. § 103(a) as being unpatentable over Arends et al. (US 6,560,712) in view of Hannah (US 5,784,581) and further in view of Odaohhara (US 6,574,740).

Applicant relies on the patentability of the claims from which these claims depend to traverse the rejection without prejudice to any further basis for patentability of these claims based on the additional limitations recited.

Applicant respectfully requests that the Examiner withdraw the rejection of claims 7 and 18 under 35 U.S.C. § 103(a) as being unpatentable over Arends in view of Hannah and further in view of Odaohhara.

4. The Examiner rejects claim 8 under 35 U.S.C. § 103(a) as being unpatentable over Arends et al. (US 6,560,712) in view of Hannah (US 5,784,581) and further in view of Shinoda (JP Patent 406337743A).

Applicant relies on the patentability of the claims from which this claim depends to traverse the rejection without prejudice to any further basis for patentability of this claim based on the additional elements recited.

Applicant respectfully requests that the Examiner withdraw the rejection of claims 7 and 18 under 35 U.S.C. § 103(a) as being unpatentable over Arends in view of Hannah and further in view of Shinoda.

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**Conclusion**

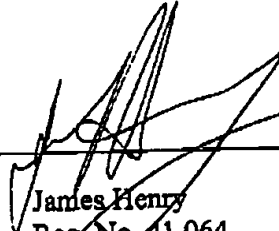
Applicant respectfully requests that a timely Notice of Allowance be issued in this case.

Respectfully submitted,

BLAKELY, SOKOLOFF, TAYLOR & ZAFMAN LLP

Dated: July 16, 2004

By

  
James Henry  
Reg. No. 41,064  
Tel.: (714) 557-3800 (Pacific Coast)